

EGAN MARINE CORPORATION FACILITY OPERATIONS MANUAL

Table of Contents

		3
*** * * * * * * * * * * * * * * * * * *		4
	•••••	5
	•••••	5
*******************	••••	5-7
••••••		9
		10
	'	
,		
		10
		11
	·	
and the second s		
		13
		14
	· · · · · · · · · · · · · · · · · · ·	
		18
		18

GEOGRAPHIC LOCATION

The dock is located along the west bank of B-Slip at Mile 301.2 of the Chicago Sanitary and Ship Canal. The nearest population center is Lemont, Illinois.

HOURS OF OPERATION

The facility will be capable of operation 24 hours a day, 7 days a week, as needed.

VESSEL INFORMATION

Individual barge size will be 7,500 bbls to 50,000 bbls. Units will be tank barges or tow boats. Facility will have the ability to deal with two barges or one boat at a time.

PRODUCT INFORMATION

The products transferred are Soybean Oil and Fuel Oil.

- (ii) (a) The name of the products are:
 - 1. Soybean Oil Soyabean
 - 2. Fuel Oil
 - (b) Description of the product is:
 - 1. Soybean Oil pale yellow or dark brown liquid or semi-liquid
 - 2. Fuel Oil clear or red liquid
 - (c) The odor of the products are:
 - 1. Soybean Oil strong odor
 - 2. Fuel Oil petroleum odor
 - (d) Hazards:
 - 1. Soybean oil:
 - Heated product can burn eyes and skin.
 - No known health hazards.
 - 2. Fuel Oil:
 - Eye contact no significant health hazards identified.

- Skin contact Causes skin irritation on prol9onged or repeated contact.
- Inhalation No significant health hazards identified for the liquid fuel.
- Ingestion Harmful or fatal if liquid is aspirated into lungs.

(e) Safe handling instruction:

1. Soybean oil:

- Hot hoses require gloves for handling.
- Use rubber gloves, splash-proof goggles, coveralls.

2. Fuel Oil:

- Use with adequate ventilation.
- Ground and bond containers when transferring materials.
- Wash thoroughly after handling.
- Store in combustible liquids storage area. Store away from heat, ignition sources, and open flame in accordance with applicable regulations.

(f) Spill or Exposure procedures:

1. Soybean oil:

- Spills pump or scoop into containers, return to plant product stream, use absorbent or flush with detergent and hot water.
- Ingestion induce vomiting and call a physician.

2. Fuel Oil:

- Spills Remove or shut off all sources of ignition. Contact office immediately to initiate response.
- Eye contact Flush eyes with plenty of water.
- Skin Wash exposed skin with soap and water. Remove contaminated clothing, including shoes, and thoroughly clean and dry before reuse.
- Inhalation If adverse effects occur, remove to uncontaminated area.

Ingestion - If swallowed, do NOT induce vomiting.
 Get immediate medical attention.

(g) Fire fighting information:

1. Soybean oil:

- Fire use CO₂, foam or dry chemical and selfcontained breathing apparatus.
- Product is **VERY** difficult to induce to burn.

2. Fuel Oil:

- Combustible liquid.
- Extinguishing media use CO₂, foam, dry chemical, or steam and positive pressure self-contained breathing apparatus.
- Fire Fighting equipment Firefighters should wear full bunker gear, including a positive pressure self-contained breathing apparatus.
- Combustion products Incomplete burning can produce carbon monoxide and/or carbon dioxide and other harmful products.
- If unable to <u>immediately</u> contain, or unsure, evacuate the area and contact office. Office contact is necessary in any event.

TRANSFER PERSONNEL

The minimum number of men on duty on shore during pumping will be one (1), anytime loading/unloading is in progress. Duties include pretransfer and during transfer check of:

- 1. Vessel moorings (156.120.a) Be sure the moorings are strong enough to hold during all expected conditions.
- 2. Transfer hoses; length (156.120.b-c) Be sure the hoses are long enough to allow the vessel to move to the limits of its moorings, and that they are supported to prevent kinks and damage.
- 3. Transfer system; alignment (156.120.d) Proper alignment of hoses and fittings.
- 4. Transfer hoses; blanked (156.120.e-f) Each part of the transfer system that is not in use is to be blanked off.
- 5. Transfer hoses; condition (156.120.i-j) Each transfer hose is to be in acceptable condition and not have kinks, tears, bulges or other defects.
- 6. Transfer system; leak-free at facility (156.120.p) The transfer system is to be leak-free.
- 7. Communication system and language fluency (156.120.q-v) Make sure the communications system is in position and operable.
- 8. Emergency shutdown procedures (156.120.r) Make sure the emergency shutdown is in position and operable. Inside the containment will be a portable pump. Emergency shutdown is activated by engaging the shutdown switch on the engine.
- 9. Sufficient personnel with training (156.120.s-t-u). One Person-in-Charge on the shore side is necessary for transfer. His training will be in accordance with regulations.

- 10. Agreement to begin transfer (156.120.w-x). Tankerman and PIC will agree to begin transfer.
- 11. Transfer connections (156.130) All flanges must have a bolt in each bolt hole. Each connection must be leak free prior to starting transfer.

EMERGENCY TELEPHONE NUMBERS

The following telephone numbers are the people to contact in an emergency:

Egan Marine Corporation	630-739-0947
Qualified Individual	
Dennis Egan	630-972-0948
Pager	630-419-6900
Alternate Qualified Individual	
Daniel Egan	630-972-1116
Pager	630-419-6907
Alternate Qualified Individual	
Barre Nall	815-722-8516
Pager	630-419-6908
Coast Guard NRC	800-424-8800
Coast Guard M.S.O.	630-986-2155 7:00am - 3:30pm
	414-747-7190 4:00pm - 7:30am
Coast Guard Milwaukee	414-747-7181 3:30pm - 7:00am
Fire Department (Lemont)	911
Illinois EPA	708-345-9780

WATCHMAN DUTIES

Watchmen are to control access to the dock area to keep unauthorized personnel out of the area. They are to make regular checks (depending on # of barges and weather conditions) of the barges at the dock and the dock area for anything that might be amiss. This can include barges listing, unauthorized visitors, spills, or other items that are out of the ordinary.

COMMUNICATIONS

Continuous two-way voice communication between the person in charge of the vessel transfer and the person in charge of facility transfer is via portable radio device. Radios are intrinsically safe as defined in 46 CFR 110.15-100(i) and meet class I, Group D requirements as defined in 46 CFR 111.80.

PERSONNEL SHELTER

The personnel shelter for transferring vegetable products is identified in the Physical Description as Dock House. It is located on the west wall of the slip next to the pipeline. Communications equipment, fire extinguishers, life rings, booms and other safety items are located here. The personnel shelter for transferring fuel oil products is located next to the fuel tanks identified in the Physical Description.

DRIP AND DISCHARGE COLLECTION

Collection of product discharge and drip will be by a container located under the termination of the pipeline and has a capacity of 37.4 barrels. The containment will be emptied with a vac truck, if necessary, and the product will be put back into the product stream.

EMERGENCY SHUTDOWN SYSTEMS

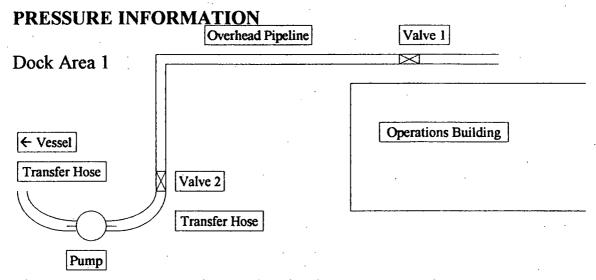
During dock to barge transfers, product movement will be by dock pump. Should an emergency arise, transfer can be halted by use of the emergency shutdown switch connected to the transfer pump. During barge to shore transfers, product movement will be by barge cargo pump. Should an emergency arise, transfer can be stopped by use of the emergency shutdown cable located on the barge.

CONTAINMENT EQUIPMENT

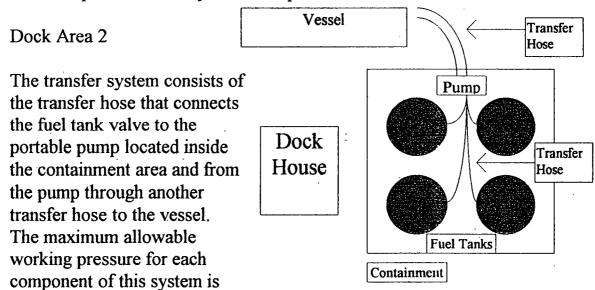
Absorbent material will be available to personnel for small spills on dock or barge. This will include individual 16 1/2" x 20" absorbent pads, each capable of 32 oz. of absorption and two (2) 8" x 10' sections of absorbent boom, for immediate containment of any spillage into canal. This equipment is located at the Dock Houses. Additional containment equipment for immediate use will be located at an area accessible within 5 minutes in the building marked "Storage Building" in the facility drawing. In the event of a possible release of product into waterway, one section of 8" x 10' boom would be placed at the front and rear of barge, extending from barge to dock face wall. This would prevent product from moving out into the main channel of the canal. Absorbent pads would then be used to absorb product, until professional remediators are on site. Heritage Remediators is located immediately adjacent to the dock area and all through the Chicago area for quick response. Also see Spill Response Plan for Facility.

FIRE EXTINGUISHING EQUIPMENT

Two (2) CO₂ fire extinguishers will be located at the dock house and will be readily available to personnel. To use them, pull the pin and direct the hose to the base of the fire. Squeeze the handle to release the contents. An additional 30 extinguisher are located in the encompassing shipyard.



The transfer system consists of the pipeline that comes from the SPCC containment behind the Operations building at Valve 1 running to Valve 2 beside the Dock House. It includes the transfer hose from Valve 2 to the Pump inside the dock containment, and from the Pump through the second transfer hose to the vessel. The maximum allowable working pressure for each component of this system is 50 psi.



50 psi.

TRANSFER PROCEDURES

Transfer of product will not commence until each person in charge designated under 154.710 and 154.700 has filled out and signed the declaration of inspection form described in paragraph (c) of 156.150. No person in charge may sign declaration unless he or she has determined by inspection, and indicated by initialing in the appropriate space on form. Once transfer is ready to commence, and each person on vessel and shore are ready to receive product, valve on truck is opened and transfer is initiated. Facility and vessel keep constant contact via two-way radio.

After product transfer is complete, dock valve is closed and transfer hose is evacuated of any product while still connected to barge header. Once emptied of product, hose is disconnected from barge header and immediately blanked while over barge spill pan.

TRANSFER PROCEDURE CHECKLIST

	Fill out and sign the Declaration of Inspection.
	Connect the hose to the piping using proper gasket and fastening components.
· .	Check communications system to make sure instructions can be understood clearly by everyone before commencing the transfer.
	While transfer is progressing - Stay alert for leaks at connections and position of hose.
	Upon completion of transfer close all valves, disconnect the hose and blind / cap accordingly using proper gasket and appropriate fastening components.
	Secure booms, cargo hose and any other gear.

EMERGENCY PHONE NUMBERS

In the event of an emergency, cellular communication will be used to contact Egan Marine Corporation office, followed by Coast Guard, NRC, and fire departments if need be.

CONTAINMENT PROCEDURE

In case of a spill in the water immediate containment would be handled by EMC and consists of the following:

Initial containment of any spillage into the canal would consist of placing sections of absorbent boom at the front and rear of vessel, extending from dock face wall to vessel. Absorbent pads and pillows would be used to absorb product until professional remediators arrive on site. Simultaneously the following contacts would be made as needed:

1 - Coast Guard National Response Center	800-424-8800	
2 - Coast Guard 7:30am - 4:00pm 4:00pm - 7:30am	630-986-2155 414-747-7190	
3 - Egan Marine Corporation	630-739-0947	
4 - Heritage	630-385-0515	
5 - Fire department (if required)	911	
6 - EPA	708-345-9780	

HAZARDOUS MATERIAL POLLUTION LAWS

Federal Regulations prohibit the discharge of oil in harmful quantities in or on any waters of the United States. Harmful quantity has been defined as sufficient oil to create a sheen. Presently, penalties up to \$10,000.00 are assessed by the Coast Guard for any person, firm or corporation who causes a discharge. Included in this act, is the provision for the Coast Guard to conduct cleanup action and later bill the polluter if the polluter is slow or delinquent in the cleanup of a pollution incident.

Other provisions of this Act include the extension of Coast Guard jurisdiction. That is, oil spilled on any waters of the United States is subject to this Act and the Coast Guard's enforcement of the Act. Also, there is a referral provision for possible criminal prosecution for any person who fails to immediately notify the Coast Guard of a spill. This is, of course, providing the person is in charge of the activities that produced the spill.

State Laws pertaining to water pollution are enforced by the Illinois Environmental Protection Agency. Although the State of Illinois claims jurisdiction over all Illinois rivers, streams and waterways relative to discharging of polluting materials to these waters, they have not attempted to duplicate the efforts of the U.S. Coast Guard of the Metropolitan Sanitary District in the surveillance of oil transfers and the arrest and prosecution of those accused of spilling oil or other hydrocarbon liquids accidentally or otherwise to the Sanitary and Ship Canal. They are more concerned with discharges which affect the quality of water as opposed to spillages which have only a temporary effect.

The Metropolitan Sanitary District of Greater Chicago has in its books a Sewage and Waste Control Ordinance. This ordinance is to provide for abatement and prevention of pollution by regulating and controlling the quantity and quality of sewage and industrial wastes admitted to or discharged into the sewage systems, sewage works and natural outlets under the jurisdiction of the Metropolitan Sanitary District of Greater Chicago. Hereinafter to be known as "The Sewage and Waste Control

Ordinance". Approved and adopted by the board of trustees of the Metropolitan Sanitary District of Greater Chicago on September 18, 1969.

This ordinance, promulgated by the Metropolitan Sanitary District of Greater Chicago, hereinafter called the Sanitary District, has as it purpose the protection of the public health and safety by abating and preventing pollution through the regulation and control of the quantity and quality of sewage and industrial wastes admitted to or discharged into the sewage systems, sewage works, waters, water courses and natural outlets under the jurisdiction of the Sanitary District.

Whoever fails to comply with an order of the Sanitary District issued in pursuance of this ordinance, shall be fined \$100.00. Each day's continuance of such failure is a separate offense. The penalties so imposed are recoverable by the Sanitary District upon its suit, as debts are recoverable at law.

PROCEDURES FOR LIGHTING

Lighting (fixed and portable) will be directed such that it does not interfere with water traffic. Lights will be pointed away from the river whenever possible. When not possible, shutters will be used to direct the light in a manner so that boats will not be hindered.

PERSONS IN CHARGE

(a) No person may serve, and the facility operator may not use the services of a person, as person in charge of facility transfer operations unless:

All persons in charge have been designated so by facility operator.

All persons will have in excess of 48 hours of experience in transfer operations.

Persons in charge know:

- the hazards of each product to be transferred
- rules in parts 145, and 156
- facility operating procedures as described in operations manual
- vessel transfer systems, in general
- each facility transfer system to be used
- local discharge reporting procedures
- the facility's contingency plan for discharge, reporting, and containment.

Persons In Charge: List available in Yard Office and in Dock House.

Informational records of all Persons In Charge are available at the Egan Marine Corporation office.

TRANSFER HOSES

Hazardous materials are not transferred at this facility, so specific hose markings are not required to identify individual hazardous transfer hoses.

All transfer hoses will be marked so that mixed use will not occur. One 4" hose marked "Dock Hose" will be used only for transferring vegetable oil products to and from vessels. The pipeline that runs from processing plant to adjacent dock house only carries vegetable products.

Diesel Fuel will be transferred only at the dock location south of the processing plant from the four (4) vertical tanks located along the main canal channel. (See Physical Description for further information.) Transfer hoses for diesel fuel are 1½" or 2" and are marked "Fuel Oil." They are only to be used for transferring fuel oil.

Drills

Drills will be scheduled in accordance with 33 CFR 154.1050.

Monthly - Facility personnel and qualified individual notification drills.

Semiannually - Facility equipment deployment drills,

Yearly - Spill management team tabletop drill.

Annual - Unannounced drill during which the spill removal organizational and spill management team shall be activated.

SECTION 3.

PHYSICAL INFORMATION

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PURPOSE

Physical information is collected to: (1) have information readily available to assist in making a proper and well–informed response to an emergency; (2) document annual equipment tests and structural surveys of piers, moorings, and other critical structures on the waterfront facility; and (3) gather other physical information required for contingency planning and port security. Disclosure of some of this information by facility operators may be voluntary and subject in part to the Privacy Act of 1974 (5 U.S.C. 552a). However, facility operators should be made aware that the lack of such information may impair the Coast Guard's response in the event of an emergency.

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A.	24 HOUR EMERGENCY CONTACTS:				
	Name/Position	Phone Nos.			
	DENNIS EGAN / PRESIDENT	630-972-0948			
	DAN EGAN /OPS MGR	630-972-1116			
	BARRE NALL /SAFETY OFFICEA				
	ROBIN CHANDA /VP	815-838-6660			
В.	. FACILITY FILE DESCRIPTION: (Inspectors may elect to use MSIS Facility File screens to complete some parts of the following sections. If so, attach copy to inspection Booklet. All other info should be recorded in booklet.)				
	Ownership: EGAN MARINE CORP. (e.g. commercial, etc.)	Use: VEG O/L (e.g. petroleum prods, etc.)			
C.	C. LOCATION:				
	Physical Location: MILE 302.1 TLLINOIS RIVER B-SLIP (harbor, port, etc) Latitude: N UNK Longitude: W UNK				
	Name of River: METROPOLITAN SANITARY DISTRICT CANKE River Mile: 302.1				
	Facility Mailing P.O. Box 669				
		60439			
D.	D. <u>INVOLVED PARTIES</u> :				
	OWNER	OPERATOR			
	NAME DENNIS EGAN	NAME SAME			
	ADDRESS P.O. Box 669	ADDRESS			
	LEMONT IL 60439				
	PHONE NO. 630-972-0948	PHONE NO.			
	CONTACT DEMAILS EGAN	CONTACT			

IPN:

IPN:

January 21, 1997

Captain of the Port United States Coast Guard 215 W. 83rd St. Suite D Burr Ridge, IL 60521

Dear Sir:

This is a Letter of Intent as required by 33CFR.154.110.

Egan Marine Corporation wishes to establish a dock facility. The purpose of this facility will be to transfer oils between Egan Marine storage tanks and barges.

Egan Marine Corporation is the Owner and Operator of this facility. Dennis Egan is the owner of Egan Marine Corporation and is the contact person.

Egan Marine Corporation is located at Mile Post 301.2 on the North bank of the Chicago Sanitary and Ship Canal. The mailing address for EMC and Dennis Egan is PO Box 669, Lemont, IL. 60439. The dock facility will be at the same location in B-Slip on the descending wall. The office can be reached at (630) 739-0947, at any time.

It is our intent to conform to all regulations.

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Thank you,

Egan Marine Corporation

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Marine Operations Mgr.